

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GRACIE BAKED LLC, WE CARE RG, INC.,
and MILLERCOBB LLC, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

GIFTROCKET, INC., TREMENDOUS, INC.,
NICOLAS BAUM, KAPIL KALE,
JONATHAN PINES, BENJAMIN KUBIC,
SUNRISE BANKS, N.A., GIFTROCKET,
LLC, TREMENDOUS LLC, and
TREMENDOUS PARENT, INC.,

Defendants.

v.

MARY BUCHNIK and ANNA
NUKHBALAIEVA,

Subpoenaed Parties.

CIVIL ACTION

Miscellaneous Case No.:
2:24-mc-00071-PD

Underlying Case: *Gracie
Baked LLC et al. v.
GiftRocket, Inc. et al.*, No.
1:22-cv-04019-RPK-VMS
(E.D.N.Y. 2022)

**DECLARATION OF MARY BUCHNIK IN SUPPORT OF SUBPOENAED
PARTIES' RESPONSE TO ORDER TO SHOW CAUSE**

I, Mary Buchnik, hereby declare as follows:

1. I am over the age of 18 years old.
2. I have personal knowledge of the matters set forth herein and am competent to testify upon them if called upon to do so.
3. I make this declaration in support of Subpoenaed Parties' Response to the Order to Show Cause and in response to GiftRocket's Motion to Compel Depositions of Mary Buchnik and Anna Nukhbalaieva, ECF No. 1 in the above-captioned action.
4. I have very limited knowledge related to the GiftRocket litigation and extremely limited involvement in this lawsuit beyond corresponding with WeCare RG, Inc.'s attorney, Raphael Janove, to find documents and communications in WeCare RG, Inc.'s possession related to the issues in this case.
5. I assert that it would be quite burdensome for me to travel two hours round-trip for a deposition in a litigation of which my knowledge is extremely limited.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on December 11, 2024 in Huntingdon Valley, PA


Mary Buchnik